

Exhibit A

Wisconsin Circuit Court Pleadings
Case No. 2024-CV-004252

Milwaukee County Case Number 2024CV004252 Katie Hansen vs. Laboratory Corporation of America

Case summary		
Filing date	Case type	Case status
05-28-2024	Civil	Open - Electronic filing
Class code description	Responsible official	Branch ID
Other-Contract	Watts-15, J. D.	15
Party summary		
Party type	Party name	Party status
Plaintiff	Hansen, Katie	
Defendant	Laboratory Corporation of America	

Parties		
Plaintiff: Hansen, Katie		
Date of birth	Sex	Race
Address (last updated 05-28-2024)		
2925 E. Koenig Avenue, Saint Francis, WI 53235 US		
Attorneys		
Attorney name	Guardian ad litem	Entered
Maynard, Timothy P.	No	05-28-2024
Clegg, Connor J.	No	05-28-2024
Defendant: Laboratory Corporation of America		
Date of birth	Sex	Race
Address (last updated 05-28-2024)		
c/o Corporation Service Company, 33 East Main Street, Suite 610, Madison, WI 53703 US		

Court record				
Date	Event	Court official	Court reporter	Amount
06-04-2024	Affidavit of service			

Date	Event	Court official	Court reporter	Amount
	Additional text: filed- as to Laboratory Corporation of America			
05-28-2024	Filing fee paid			\$304.00
	Additional text: Adjustment Number: 24A 057355, Payable Number: 1163365, Receipt Number: 24RP022018, Amount: \$304.00			
05-28-2024	Case initiated by electronic filing			
05-28-2024	Summons and complaint	Watts-15, J. D.		

FILED

05-28-2024

Anna Maria Hodges

Clerk of Circuit Court

2024CV004252

Honorable J. D. Watts-15

Branch 15

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

Branch _____

KATIE HANSEN,
2925 E. Koenig Avenue
St. Francis, WI 53235

Plaintiff,

Case No.: 24-cv-_____

Case Code: 30303

v.

LABORATORY CORPORATION OF AMERICA,
c/o CORPORATION SERVICE COMPANY
33 East Main Street, Suite 610
Madison, WI 53703



Defendant.

SUMMONS

THE STATE OF WISCONSIN

To each person named above as a Defendant:

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this summons, you must respond with a written answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the court, whose address is 901 North 9th Street, Room 104, Milwaukee, Wisconsin 53233, and to, Plaintiff's attorney, whose address is 5150 N. Port Washington Road, # 243, Milwaukee, WI 53217. You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 28 day of May 2024.

By: s/ Timothy P. Maynard
Timothy P. Maynard, State Bar No. 1080953
Email: tmaynard@hq-law.com
Connor J. Clegg, State Bar No. 1118534
Email: cclegg@hq-law.com

Hawks Quindel, S.C.
5150 N. Port Washington Road, Suite 243
Milwaukee, WI 53217
Phone: (414) 271-8650
Fax: (414) 207-6079

Attorneys for Plaintiff

FILED
05-28-2024
Anna Maria Hodges
Clerk of Circuit Court
2024CV004252
Honorable J. D. Watts-15
Branch 15

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

Branch _____

KATIE HANSEN,
2925 E. Koenig Avenue
St. Francis, WI 53235

Plaintiff,

Case No.: 24-cv-_____

Case Code: 30303

v.

LABORATORY CORPORATION OF AMERICA,
c/o CORPORATION SERVICE COMPANY
33 East Main Street, Suite 610
Madison, WI 53703

Defendant.

COMPLAINT

Plaintiff, Katie Hansen, by her attorneys, Timothy P. Maynard and Connor J. Clegg of Hawks Quindel, S.C., brings this Complaint against Defendant, Laboratory Corporation of America ("Labcorp").

JURISDICTION AND VENUE

1. The Court has personal jurisdiction over Defendant, Labcorp pursuant to Wis. Stat. § 801.05(1)(c) because Labcorp is engaged in substantial and not isolated activities within the State of Wisconsin.

2. Venue is proper in this Court pursuant to Wis. Stat. §801.50(2)(c) because Defendant Labcorp employed Plaintiff Hansen in Milwaukee County and does substantial business within Milwaukee County.

PARTIES

3. Plaintiff, Katie Hansen, is an adult resident of Wisconsin residing at 2925 E. Koenig Avenue, St. Francis, WI 53235.

4. Defendant, Labcorp ("Labcorp" hereinafter) is a foreign corporation with its principal place of business in Burlington, North Carolina. Labcorp's Registered Agent for service of process is Corporation Service Company, 33 E. Main Street, Suite 610, Madison, WI 53703.

FACTUAL ALLEGATIONS

1. Plaintiff Hansen began working for Ascension as a PST Team Leader in 2019.
2. In 2022, her employment transitioned to Labcorp when Labcorp took over lab work for Ascension.
3. During her employment with Labcorp, Plaintiff Hansen was covered by a short-term disability insurance ("STDI") policy under an established employee benefits plan ("Plan") for which Alight serves as claims administrator.
4. Plaintiff Hansen has been disabled under the Plan due to her medical conditions since April 18, 2023.
5. Plaintiff Hansen filed a claim with Labcorp, via Alight, for STDI benefits under the Plan.
6. Labcorp, via Alight, denied Plaintiff Hansen's claim for STDI benefits under the Plan.
7. Plaintiff Hansen timely and fully appealed Labcorp's decision to deny her STDI benefits under the Plan.
8. Labcorp, via Alight, denied Plaintiff Hansen's appeals.

9. Plaintiff Hansen submitted complete medical documentation in support of her disability to Labcorp.

10. Plaintiff Hansen submitted all information requested by Labcorp with her appeals.

11. Labcorp failed to consider all the issues raised in Plaintiff Hansen's appeals.

12. Labcorp ignored clear medical evidence of Plaintiff Hansen's medical conditions and disability as provided with her appeals.

13. Labcorp did not provide Plaintiff Hansen with an opportunity for a "full and fair review" of Plaintiff Hansen's claim or appeals.

14. Labcorp failed to notify Plaintiff Hansen of the additional material necessary in order for Plaintiff Hansen to perfect her claim and an explanation of why that material was necessary.

15. Labcorp failed to adequately explain why it rejected, or ignored, specific evidence in Plaintiff Hansen's file.

16. Labcorp failed to engage in a meaningful dialogue with Plaintiff Hansen.

17. Labcorp failed to adequately explain its reasons for denying Plaintiff Hansen benefits.

18. Labcorp conducted a selective review of the information and documentation submitted by Plaintiff Hansen in support of her claim and appeals.

19. Labcorp failed to adequately assess Plaintiff Hansen's employability before determining that she is not sufficiently disabled to qualify for benefits.

20. At all times material to this case, the Plan has remained in full force and effect and Plaintiff Hansen has met the Plan's definition of Disability.

21. Labcorp's denial of Plaintiff Hansen's claim for STDI benefits caused Plaintiff Hansen to suffer the loss of benefits and to incur expenses.

FIRST CAUSE OF ACTION:
VIOLATION OF WIS. STAT. CH. 109 – UNPAID WAGES

5. The preceding paragraphs are reincorporated by reference as though set forth here in full.

6. At all relevant times, Plaintiff was an employee of Labcorp as defined by Wis. Stat. Section 109.01(1r).

7. At all relevant times, Labcorp was an employer of Plaintiff under Wis. Stat. Section 109.01(2).

8. STDI benefits available to Plaintiff under the Plan constitute wages as defined by Wis. Stat. Section 109.01(3).

9. Wis. Stat. Section 109.03 requires employers to make payments of all wages earned by an employee by the earlier of the 31 days after the date such wages earned or the date on which the employee regularly would have been paid under the employer's established payroll schedule.

10. Labcorp's failure to pay STDI benefits due to Plaintiff under the Plan constitutes a violation of Wis. Stat. Section 109.03.

11. Plaintiff is entitled to civil penalties in the amount of 50% of her unpaid wages from Labcorp pursuant to Wis. Stat. Section 109.11(2)(a).

12. Plaintiff is entitled to recovery of her attorneys' fees and costs pursuant to Wis. Stat. Section 109.03(6).

REQUEST FOR RELIEF

WHEREFORE, Plaintiff Hansen demands judgment be entered against Labcorp for the following:

- A. Payment of all retroactive STDI benefits owed to Plaintiff as wages under the terms and conditions of the Plan pursuant to Wis. Stat. Ch. 109;
- B. Civil penalties in the amount of 50% of Plaintiff Hansen's unpaid STDI benefits;
- C. Prejudgment interest;
-
- D. Reasonable attorneys' fees and costs related to this action; and
- E. Such other legal or equitable relief as this Court deems just and necessary to vindicate Plaintiff's rights under Wisconsin law.

DEMAND FOR JURY TRIAL

Pursuant to Wis. Stat. § 805.01, Plaintiff demands a trial by jury.

Dated this 28 day of May 2024.

By: s/ Timothy P. Maynard

Timothy P. Maynard, State Bar No. 1080953

Email: tmaynard@hq-law.com

Connor J. Clegg, State Bar No. 1118534

Email: cclegg@hq-law.com

Hawks Quindel, S.C.

5150 N. Port Washington Road, Suite 243

Milwaukee, WI 53217

Phone: (414) 271-8650

Fax: (414) 207-6079

Attorneys for Plaintiff

STATE OF WISCONSIN**CIRCUIT COURT****MILWAUKEE**

Katie Hansen vs. Laboratory Corporation of America

**Electronic Filing
Notice**

Case No. 2024CV004252

Class Code: Other-Contract

FILED

05-28-2024

Anna Maria Hodges

Clerk of Circuit Court

2024CV004252

Honorable J. D. Watts-15

Branch 15

LABORATORY CORPORATION OF AMERICA
33 EAST MAIN STREET, SUITE 610
C/O CORPORATION SERVICE COMPANY
MADISON WI 53703

Case number 2024CV004252 was electronically filed with/converted by the Milwaukee County Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a fee to register as an electronic party. This fee may be waived if you file a Petition for Waiver of Fees and Costs Affidavit of Indigency (CV-410A) and the court finds you are indigent under §814.29, Wisconsin Statutes.

If you are not represented by an attorney and would like to register an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

Pro Se opt-in code: 0a6a46

Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 414-278-4140.

Milwaukee County Circuit Court
Date: May 28, 2024

Professional Process Servers
250 E Wisconsin Ave, 18th Floor
Milwaukee, Wisconsin 53202

FILED
INVOICE NO. 97806
06-04-2024
State of Wisconsin
Anna Maria Hodges
County of Milwaukee
Clerk of Circuit Court
2024CV004252

Affidavit of Personal Service on Corporation or Limited Liability Company

Client: Hawks Quindel S.C.

Case Name: Katie Hansen

Vs LABORATORY CORPORATION OF AMERICA

Case Number: 2024CV004252

Documents to be Served:

Authenticated Copy of Summons and Complaint, Electronic Filing Notice

Corporation or LLC Served: LABORATORY CORPORATION OF AMERICA, c/o CORPORATION SERVICE COMPANY

Served person apparently in charge of office or officer, director, or managing agent name:

Andrew Schumacher, Administrative Assistant

Address Where Served:

33 E Main St Suite 610, Madison, WI 53703-3095

Date and Time Served:

06/03/24 9:37 AM

Other Pertinent Information:



I certify that I am an adult resident of the State of **Wisconsin**, not a party to this action, and that I served the document upon the person at the place on the date and at the time stated above.

SIGNATURE: _____

PROCESS SERVER'S NAME: Addison Beste

Fee for service: \$75.00

State of Wisconsin, County of Waukesha

Subscribed and sworn to before me

this 3 day of June, 2024

Notary Public, State of Wisconsin

My Commission Expires: 11/22/26